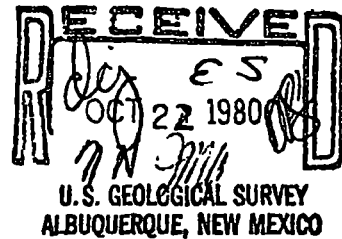


UNITED STATES DEPARTMENT OF AGRICULTURE
FOREST SERVICE
Region 3
517 Gold Avenue, SW
Albuquerque, New Mexico 87102



1990
October 21, 1980

Mr. Harry D. Early, Governor
Pueblo of Laguna
P.O. Box 194
Laguna, New Mexico 87026

Confidential Claim Retracted

Authorized by: SC

Date: 6/20/13



Dear Governor Early:

This letter is in regard to the requested review of the Jackpile -
Paguate Uranium Mine Reclamation Plan.

For ease in coordination and combination of review comments, we
have referenced our comments to the draft USGS comments as the
other reviewers are doing. Therefore, the number in parenthesis
on our specific comments ties directly to the identical USGS comment.

General Comment

After initial review of the reclamation plan, it appears that as
far as reclamation and vegetation establishment are concerned, this
plan consists of unsupported conclusions. In summary, since 1976
revegetation work began, the plan states that nearly 500 acres have
been stabilized, recontoured and revegetated to date. Thus, the
company has, or should be able to obtain in a short time, sufficient
data to come up with an acceptable, quantifiable reclamation plan.

Specific Comments

2.2 RECLAMATION OBJECTIVES pages 7 and 8

The last paragraph needs to list where the supporting data for this
comes from. If the company has the supporting data, then they are
really shorting themselves as well as the Pueblo by not effectively
using the data here.

The Pueblo should emphasize the following points and questions on
this most important lack of data problem:

Is the data available? Is the available data adequate? Does the
company need more data? The company needs to emphasize the reclaimed
areas as to species diversity and cover as well as vegetative establish-
ment versus a check or undisturbed (unmined) adjacent similar areas.
(USGS #16 and #58) The Pueblo should also request the company to
briefly review reclamation procedures used to date. Are these reclamation
measures adequate or does the company need to use some other methods
or combinations?



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4.3 ON-GOING RECLAMATION ACTIVITIES page 20

The company needs to list the results (success and failures) of the revegetation work done since 1976. As a minimum, list the work done in 1976, 77, 78, 79 and 80. It would be well to include photographs and maps of reclamation work in the Volume 2 section of the plan.

5.2 ENVIRONMENTAL STUDIES CONDUCTED (h) Range Surveys, page 24

Has the company conducted any vegetative or range surveys to date? If so, then the results must be listed. If none have been completed, then the plan should specifically state what will be done, when and by whom. (USGS #20)

6.1.10 REVEGETATION METHODS page 33

The brief description of what equipment which will be used (page 34, 3rd paragraph) is sufficient as is. However, the following basic information must be listed as it could not be found in the report:

Which specific species will be used?

What time of year will seeding take place?

Has irrigation been used? Which type? How often?

Should irrigation be used?

Successful species mixture to be used plus seeding rates in relation to what has been successful on the 500 acres revegetated to date. (USGS #17, #18, #22 and #23)

Table 6.1-4 page 35

Which of these species are successfully established on the reclaimed areas?

6.1.10 REVEGETATION METHODS 2nd paragraph, page 35.

Data or information source for the following statement should be listed, "Experience from existing Jackpile - Paquato Mine reclamation activities has shown that an undisturbed growth period of three years is required to achieve the desired livestock carrying capacity." (USGS #20 and #58)

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As Bob Partido advised you, in essence of time, he is submitting a copy of his comments to Mr. Marc Nelson of USGS for combination of review comments on this plan.

We are hopeful that our review and input has assisted you and the Pueblo in this important matter of the mine shutdown. Please advise us as to the date and time for additional review of this plan and we will be happy to assist the Pueblo in this matter.

We are supportive of this type of multi-Federal agency review and I wish to emphasize that assisting you and other Indian pueblos and tribes, when requested, is part of the overall Forest Service mission.

If we or Bob Partido or my staff can assist you in the future, please do not hesitate to contact us.

Sincerely,

~~WILLIAM C. TROXEL~~

WILLIAM C. TROXEL
Director
Area Planning and Development

cc: Marc E. Nelson, USGS, Albuq., NM